



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

VIRGINIA LAW REVIEW

Published Monthly, During the Academic Year, by University of Virginia Law Students

Subscription Price, \$2.50 per Annum - - 35c per Number

Editorial Board.

G. B. VEST, *President.*
CLAUDIUS TERRELL, *Note Editor.*
R. P. HAMILTON, JR., *Decisions Editor.*
T. M. EDMUNDS, *Book Review Editor.*
W. J. BERGSTROM,
B. F. BLACK,
A. V. BRYAN,
J. S. CHAPMAN, JR.,
R. C. COLEMAN,
R. B. GAITHER,
S. M. KOOTZ,
M. H. LAVENSTEIN,

G. R. MARTIN,
E. B. MEADE,
T. J. MICHIE, JR.,
H. P. MORRIS,
PARSONS NEWMAN,
E. M. PRESTON,
F. D. G. RIBBLE,
E. P. RUSSELL,
M. T. SPICER, JR.,
D. N. SUTTON,
J. M. H. WILLIS,
S. D. WOLFE.

J. B. RIXEY, *Business Manager.*

S. L. DEVIER, *Ass't Business Mgr.*

R. E. SHANDS, *Adjunct Business Mgr.*

FOREWORD.—THE VIRGINIA LAW REVIEW was not published during the session of 1918-1919. This was due to a combination of unavoidable circumstances, which arose directly or indirectly out of the war. Chief among these was the fact that the Law School did not open until after the Christmas holidays. There was a comparatively small attendance throughout the year, and especially was there a small number of experienced men on the Editorial Staff of the VIRGINIA LAW REVIEW. Furthermore, it was found that it would be almost impossible to finance the publication during the session. These difficulties combined to make the publication of the REVIEW impracticable.

However, with this number the VIRGINIA LAW REVIEW begins its sixth volume. The present Board of Editors will continue the policy adopted by the previous Boards. In taking up the work again, after a lapse of one year, the difficulties which confront the Board are necessarily greater than they ordinarily would be. But notwithstanding this, the Board expects to uphold the standard of former years. To those who contribute our leading articles, we wish to express our sincere appreciation, for their assistance has alone made possible whatever we may have achieved in the past or may achieve in the future.

THE LAW SCHOOL.—The enrollment in the Law School is larger this year than ever before, there being 289 registered stu-

dents at the date of going to press. This increase in numbers is especially noticeable, when compared with the small enrollment of last year, when the total number of registrants was only 135. The following table indicates the enrollment by states and countries:

Alabama	2	Mississippi	2
Arkansas	2	New Jersey	1
Connecticut	2	New York	7
District of Columbia	7	North Carolina	7
Delaware	4	Ohio	2
Florida	3	Oklahoma	2
Georgia	9	Pennsylvania	4
Idaho	1	South Carolina	14
Louisiana	1	Tennessee	10
Kentucky	6	Texas	5
Maryland	6	Virginia	174
Michigan	1	West Virginia	10
Missouri	2	Wyoming	1
Montana	4		
		Total	289

The opening of the session marks several changes in the Faculty. Professor Dobie, who has been absent for the past two years in military service in France, has returned to the Law School. Professor Hyde, who has also returned after an absence in military service, has charge of the work of Professor Eager, who has been granted a year's leave of absence. The instructor system, which has been suspended since 1917, has this year been restored.

RIGHT OF CREDITORS TO SUBJECT THE PROCEEDS OF LIFE INSURANCE POLICIES BELONGING TO A BANKRUPT ESTATE.¹—Under the Bankruptcy Act an interesting question arises as to the disposition of the proceeds of life insurance policies belonging to an estate which has been adjudicated bankrupt. This especially involves the rights of creditors who have or have not, respectively, participated in the distribution of the estate under bankruptcy proceedings. The provision in the Act which directly bears upon this subject is § 70a (5), which reads as follows:

“Provided, that when any bankrupt shall have any insurance policy which has a cash surrender value payable to himself, his estate or personal representative, he may, within thirty days after the cash surrender value has been ascertained and stated to the trustee by the company issuing the same, pay or secure to the trustee the sum so ascertained and stated, and continue to hold, own and carry such policy free from the

¹ For a general discussion of life insurance policies as assets in bankruptcy, see, 2 VA. LAW REV. 425.